



U.S. Department of Justice

*United States Attorney
District of Maryland*

LaRai Everett
Assistant United States Attorney
LaRai.Everett@usdoj.gov

Suite 400
36 S. Charles Street
Baltimore, MD 21201-3119

DIRECT: 410-209-4869
MAIN: 410-209-4800
FAX: 410-962-0717

April 16, 2025

The Honorable Matthew J. Maddox
U.S. District Court Judge
U.S. District Courthouse
101 West Lombard Street
Baltimore, MD 21201

RE: United States v. Dominique Makle, et al.
Crim No.: MJM-22-0295

Dear Judge Maddox:

The Court approved a status update on March 4, 2025. ECF No. 209. At that time, the government, along with all counsel, requested another 45 days. I write now to update the Court on the progress.

At this time, the discovery previously provided to Mr. Scovens has been provided again to his new counsel, Mr. Wright. Mr. Wright and the government are also in the process of scheduling a reverse proffer. Due to both of our trial schedules we were unable to complete this task earlier. The government recently provided several dates at the end of April and beginning of May. The government is awaiting Mr. Wright's response to schedule the reverse proffer, but I anticipate he will respond soon. As for Mr. Stewart, his attorney advises me that we are close to a resolution and requested another 30 days to finalize the plea agreement discussions. I have reached out to counsel for Mr. Makle but he has not responded. I do not know his status. I will continue to contact him though.

As a result of the continued efforts to resolve this matter, the Government requests a status update in 30 days. I thank the Court for its consideration of this matter.

Sincerely,

Kelly O. Hayes
United States Attorney

/s/
LaRai Everett
Jonathan Tsuei
Assistant United States Attorneys